

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL MCMAHON,
ZHENG CONGYING and
ZHU YONG,
also known as “Jason Zhu,
Defendants.

Case No. 1:21-cr-00265 (PKC) (S-1)

**NOTICE OF MICHAEL MCMAHON’S
POST-TRIAL MOTIONS**

Filed Electronically

TO: All Counsel of Record

PLEASE TAKE NOTICE that, Defendant, Michael McMahon, by and through his counsel, Gibbons P.C. (Lawrence S. Lustberg, Esq. and Genna A. Conti, Esq. appearing), shall move before the Honorable Pamela K. Chen, United States District Judge for the Eastern District of New York, at 225 Cadman Plaza East, Brooklyn, New York 11201, on a date to be set by the Court, for the entry of an Order granting Defendant Michael McMahon’s Post-Trial Motions for a Judgment of Acquittal, pursuant to Federal Rule of Criminal Procedure 29 or, in the alternative, for a New Trial, pursuant to Federal Rule of Criminal Procedure 33 and for such additional relief as the Court may deem just and appropriate in connection therewith (the “Motions”).

PLEASE TAKE FURTHER NOTICE that in support of the Motions, Mr. McMahon shall rely upon the accompanying Brief in Support of Defendant Michael McMahon’s Post-Trial Motions, as well as the Trial Transcripts and Trial Exhibits, referenced therein, which are part of the record, and will be provided upon request.

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that oral argument is respectfully requested.

Dated: August 10, 2023

Respectfully submitted,

s/ Lawrence S. Lustberg
Lawrence S. Lustberg
Genna A. Conti
GIBBONS P.C.
One Gateway Center
Newark, New Jersey 07102
Tel: (973) 596-4500
Fax: (973) 596-0545
llustberg@gibbonslaw.com
gconti@gibbonslaw.com

Attorneys for Defendant Michael McMahon